

**Department of Health and Human Services**

**OFFICE OF  
INSPECTOR GENERAL**

**TEMPORARY ASSISTANCE  
FOR NEEDY FAMILIES**

Improving the Effectiveness and Efficiency  
of Client Sanctions



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Inspector General**

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# EXECUTIVE SUMMARY

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## PURPOSE

To describe how States administer client sanctions under the Temporary Assistance for Needy Families (TANF) program.

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## BACKGROUND

In 1996, Congress significantly overhauled the welfare system with the passage of the *Personal Responsibility and Work Opportunity Reconciliation Act* (PRWORA, P.L. 104-193), eliminating Aid to Families with Dependent Children (AFDC). Temporary Assistance for Needy Families (TANF) replaced AFDC with State block grants, giving States more authority to design programs that move clients from welfare to self-sustaining employment. Except where expressly provided under PRWORA, the Federal Government may not prescribe State spending on TANF.

The TANF program grants cash assistance on a time-limited basis to needy families, but requires States to implement more stringent work requirements than under AFDC. The TANF law encourages States to create programs that are two-pronged: 1) they should move clients to work quickly and 2) they should encourage “personal responsibility.” The law gives States broad authority to set their own time limits on cash assistance and when clients must participate in work activities.

Clients who fail to comply with TANF program rules and requirements face sanctions, including cash assistance reductions ranging from \$25 to lifetime ineligibility. States vary in how they define client sanctions and penalties, including the amounts and durations of sanctions. As of August 1998, 37 States impose full-family sanctions, eliminating cash assistance to the entire family. In general, States sanction clients for a minimum amount of time for each instance of noncompliance or until the client complies. Five States have policies that include lifetime exclusion from TANF.

States can decide how and when to inform clients of sanction policies and sanction decisions. They use several methods to resolve client disputes of sanction decisions, including conciliation meetings.

Reliable and comparable State statistics on TANF client sanctions currently are not available. The Administration for Children and Families (ACF) required all States to report 1998 TANF caseload data under a temporary “emergency” reporting system. However, ACF has discovered inconsistencies in how States define and report case closure and sanction information. At the time of this report’s publication, ACF had not

published 1998 data on benefit reductions and case closures resulting from sanctions and was working with States to standardize data reporting.

The General Accounting Office (GAO) also is conducting a national study on client sanctions under TANF. Using data obtained from selected States, GAO will report sanction and case closure data.

The objective of our study is to describe how sanctions are being administered at State and local government levels, with special emphasis on caseworker implementation. We purposefully selected an 8-State sample from which we visited a total of 26 TANF offices in both urban and rural areas. At most sites, we conducted separate focus groups with TANF caseworkers and clients. We also met with TANF office directors and selected caseworkers, who assisted us with limited case-file reviews of recently sanctioned TANF clients. We collected and reviewed State and county policies, publications, and notices from each TANF office. In each of the sample States, we interviewed staff from at least one client advocacy organization.

The methods used during this study pose some distinct advantages and disadvantages for the scope of our findings. The purposeful sample allowed us to examine sanction implementation in States with widely varying attributes. We also gained thorough information on our respondents' relationships with and attitudes towards sanctions. Our methodology precludes us, however, from commenting on the extent to which our findings and observations are representative nationwide. We also cannot evaluate direct outcomes of sanction policies, procedures, and practices on clients and the program.

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## **FINDINGS**

### **Caseworkers use sanctions to motivate clients, not to punish them**

Caseworkers report that they use sanctions either to motivate clients to comply with TANF programs or to motivate personal responsibility in general. Sanctions are consistent with State program objectives and serve as a tool to encourage clients to comply with program rules.

### **Sanctions are more effective when they are administered on a case-by-case basis**

Sanctions are effective for some clients, such as those earning unreported income. Long-term clients, frequently from inter-generational welfare families, require more extensive services. Encouraging compliance from this group through sanctions or other means is exceedingly difficult. Some TANF offices have developed simple procedures, such as mandatory conciliation meetings and home visits, to prevent inappropriate client sanctions.

## **Sanctions are less effective when clients face substantial barriers to compliance**

Since some TANF clients face obstacles that hinder their immediate program participation, sanctions are not always effective. Client barriers include substance abuse, mental illness, low literacy, domestic violence, and lack of transportation and childcare. Some TANF caseworkers have inadequate resources to identify their clients' barriers, leaving them few options but to sanction noncompliant clients.

## **Sanctions are administered more efficiently when the TANF office is a “one-stop job center” staffed by total case managers**

Case managers who have decision-making authority and access to extensive on-site client services can effectively identify and remove client barriers and use sanctions more efficiently. Some TANF offices, however, fragment their client services among several providers, leading to strained client communications and inefficient sanctions. In some TANF offices, caseworkers are unaware of the reasons and remedies for client sanctions imposed by social service contractors and other third parties.

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## **Summary**

This report is intended to provide a broad introduction to State administration of client sanctions under TANF. The companion reports (referenced below) provide more detailed information, including recommendations to improve Federal guidance.

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This is one of three OIG reports on how States administer client sanctions under TANF. One companion report, *Temporary Assistance for Needy Families: Educating Clients about Sanctions* (OEI-09-98-00291), describes how States communicate to clients the changes in sanction policies and procedures. The other, *Temporary Assistance for Needy Families: Improving Client Sanction Notices* (OEI-09-98-00292), reviews State methods for informing clients of sanction decisions via written notices.

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# INTRODUCTION

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## PURPOSE

To describe how States administer client sanctions under the Temporary Assistance for Needy Families (TANF) Program.

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## BACKGROUND

In the summer of 1996, Congress significantly overhauled the welfare system with the *Personal Responsibility and Work Opportunity Reconciliation Act* (PRWORA, P.L. 104-193), ending federally-funded welfare entitlements. When President Clinton signed the bill into law in August 1996, Aid to Families with Dependent Children (AFDC) was replaced with Temporary Assistance for Needy Families (TANF), a block grant program that gives States more authority and flexibility to design programs that move clients from welfare to self-sustaining employment. Except where expressly provided for under PRWORA, the Federal Government may not prescribe State spending of TANF block grant funds.

The TANF program grants cash assistance to needy families on a time-limited basis, but requires States to implement more aggressive and immediate work requirements than AFDC's Job Opportunities and Basic Skills (JOBS) program. With few exceptions and after State-administered skills assessments, TANF requires clients<sup>1</sup> to participate in work activities (e.g., subsidized or unsubsidized employment, time-limited training, or community service). Clients must participate in work activities after a maximum of 2 years on cash assistance and are limited to 5 years of federally-funded cash assistance. States have authority to require work sooner and may extend aid beyond the 5-year limit, provided States use no Federal funds towards the individual grant.

The TANF law includes guidance to States on work requirements and allows States to design their own programs that encourage clients to be responsible for their families' well being. Since Federal cash assistance to needy families is time-limited, TANF clients must move quickly from welfare dependency to self-sufficiency. To achieve this, States may develop programs that encourage the formation and maintenance of two-parent families, strengthen child-support collection from absent parents, and ensure child immunization and school attendance.

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<sup>1</sup> For purposes of this report, a TANF "client" is the head or heads of the family receiving cash assistance.

To encourage clients to follow the new program rules and requirements, TANF allows States broader authority to reduce or eliminate cash assistance to noncompliant clients. By sanctioning clients, States can link their programs that encourage “personal responsibility” to the cash assistance that they administer.

## **Client Sanctions under TANF**

The TANF law provides sanctions as one mechanism for promoting client “personal responsibility.” Client sanctions under the new program have a “dual intent.”<sup>2</sup> They (1) motivate clients to participate in welfare-to-work programs and (2) hold clients accountable for their actions. According to the General Accounting Office (GAO), States that had strengthened their sanction provisions in an effort to shift accountability to clients had imposed the most client benefit-terminations nationally in 1996.<sup>3</sup> The three States that shared this approach accounted for approximately 72 percent of all AFDC benefit terminations.

Clients who do not follow TANF program rules and requirements face various penalties, including cash assistance reductions ranging from \$25 to lifetime ineligibility. Although client sanctions existed under AFDC, States now have increased authority to define sanctionable offenses and specific penalties. Federal TANF law directs States to sanction clients for not participating in work activities and/or not cooperating with child-support enforcement efforts. States also may sanction clients for testing positive for controlled substances, not following an “Individual Responsibility Plan,” refusing to work towards achieving a high-school diploma or the equivalent, failing to attend school, and/or failing to attend required meetings or other program activities (e.g., training sessions).

Definitions of client sanctions vary among States. While noncompliance with some program requirements may result in a pro rata sanction for existing clients, it may result in ineligibility for new clients. For example, failure by a client to appear for an orientation session is cause for a sanction in some States. In other States, it would cause an “administrative case closure” for a client at an application stage. Failure to provide proof of child immunizations could cause a sanction, a monetary “penalty,” or a case closure, depending on the eligibility status of the family’s case.

Sanctioned clients who remain on the TANF roles for more than 3 out of the previous 12 months encumber States’ efforts to achieve minimum mandated participation rates. States face block grant reductions if they fail to ensure that a minimum percentage of their TANF clients are engaged in work activities.

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<sup>2</sup> The Urban Institute, *Building an Employment Focused Welfare System: Work First and Other Work-Oriented Strategies in Five States*, June, 1998, pages 48-53.

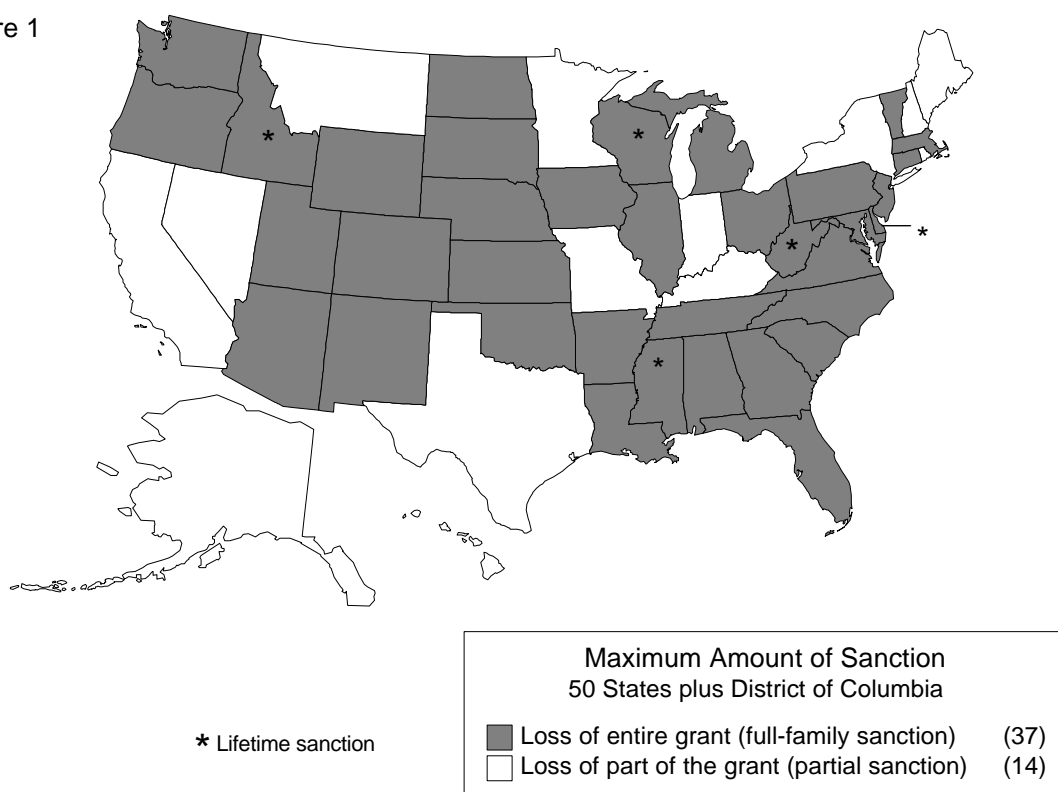
<sup>3</sup> The General Accounting Office, *Welfare Reform: States’ Early Experiences with Benefit Termination*, May 1997.



## Sanction Amounts and Duration

While the TANF law mandates minimum benefit reductions for some sanctions (e.g., a 25 percent cash assistance reduction for failure to participate in child-support enforcement efforts), States may set maximum benefit reduction levels ranging from the adult's portion of cash assistance to a "full-family" sanction that eliminates all cash assistance to the entire family. States also may increase sanctions for clients who repeatedly fail to comply with program rules and requirements. For example, some States incrementally reduce cash assistance to families with each incidence of client noncompliance, sometimes leading to the loss of the entire cash grant. As of August 1998, 37 States administer "full-family" sanctions as either the first sanction or as the maximum in a series of progressive sanctions (see figure 1).<sup>4</sup> Five States impose a lifetime sanction on clients who repeatedly fail to comply with program rules.<sup>5</sup>

Figure 1



<sup>4</sup> Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research and Evaluation, *TANF Program First Annual Report to Congress*, August 1998.

<sup>5</sup> Ibid.

Sanction durations also have changed under TANF. Under JOBS, Federal rules mandated that the first client sanction continue until the client complied, the second sanction for at least 3 months, and the third and subsequent sanctions for a minimum of 6 months. The TANF program requires that States, at a minimum, reduce the cash assistance pro rata for each month a client receives assistance and is not in compliance. States also can set maximum sanction amounts and duration, including, as mentioned previously, lifetime ineligibility. Some States sanction clients indefinitely, until they comply.

## **Conciliations, Appeals, and Fair Hearings**

The TANF program affords States more flexibility to design programs that resolve client disputes of sanction decisions. Under JOBS, before individual benefits were interrupted, States were required to begin a conciliation process that (1) explained the sanction decision to the client and (2) attempted to resolve any client disputes of the decision. The conciliation focused on moving the client into compliance before a sanction was imposed. Under TANF, States no longer must conciliate disputes prior to sanctioning, although some States have left intact the conciliation processes they had used under JOBS.

States were required under AFDC to inform clients of their right to appeal decisions formally and participate in fair hearings to resolve disputes over sanctions. States must still provide clients the option to appeal sanction decisions and must have a system of fair hearings to resolve appeals. State appeals and fair hearings policies may vary since TANF requires only that States certify that they have a fair hearing process in place and describe it.

## **Informing Clients of Program Rules and Sanction Decisions**

Under TANF, States decide how to inform clients of sanction policies, individual decisions to sanction, the conciliation process, how to restore benefits once sanctioned, and the appeals and fair hearings processes. States can, for example, conduct individual or group orientation sessions, provide all clients with packets of materials including policy information, or choose to inform clients of decisions to sanction using letters, phone calls, and/or home visits. For more information on TANF communications and client sanction notices, see the companion reports entitled *Client Sanctions under Temporary Assistance for Needy Families: Challenges in Communication*, OEI-09-98-00291, and *Client Sanctions under Temporary Assistance for Needy Families: Improving Client Sanction Notices*, OEI-09-98-00292.

## **State Sanction Data**

Reliable and comparable State statistics on TANF client sanctions currently are not available. The Administration for Children and Families (ACF) required all States to report 1998 TANF caseload data under a temporary “emergency” reporting system. However, ACF has discovered inconsistencies in how States define and report case

closure and sanction information. At the time of this report's publication, ACF had not published 1998 data on benefit reductions and case closures resulting from sanctions and was working with States to standardize data reporting.

The GAO also is conducting a national study on client sanctions under TANF. Using data obtained from selected States, GAO will report sanction and case closure data.

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## METHODOLOGY

Our study focuses on State administration of client sanctions under TANF, with special emphasis on caseworker-level implementation. We purposefully selected an eight-State sample based on:

- ▶ percent change in TANF recipient population,<sup>6</sup>
- ▶ State policies on TANF client sanctions (e.g., full-family versus partial grant reduction),
- ▶ percent of national recipient population, and
- ▶ geographic diversity.

Since our sample was purposeful, we do not project any findings or observations to any States other than those in the sample. We visited the following States: California, Florida, Idaho, Michigan, Minnesota, New York, Ohio, and Texas. In each State, we visited at least two TANF offices -- an urban office and a rural office. We conducted preinspection research in July and August 1998 in Maryland and Nevada prior to conducting our formal fieldwork which we concluded in November 1998.

In total, we visited 26 TANF offices in 22 counties. In each office, we conducted a focus group with caseworkers. The focus groups varied in size from 2 to 15 workers. We also interviewed some caseworkers individually and conducted limited case-file reviews of recently sanctioned TANF clients. We interviewed the director of the TANF office in each county and clients in 19 of the 26 offices. The client interviews ranged in size from an individual to a group of more than 20. The clients were selected either in advance by the TANF office or during our visit while they were present for other business. We also collected and reviewed State and county policies, publications, and notices from each TANF office. In each State, we interviewed staff from at least one client advocacy organization. In total, we conducted 9 interviews with 15 advocacy organizations.

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<sup>6</sup>The primary factor for State selection was TANF recipient population reduction rates since TANF was implemented. Based on the reduction rates, States were stratified into four groups, from which we chose two States per group. While we would have preferred to use State sanction rates, reliable client sanction data for all 50 States did not exist at the time we selected the sample. We felt that caseload reduction rates were the most reasonable proxy for sanction rates in selecting this purposeful sample.

The methods used during this study pose some distinct advantages and disadvantages for the scope of our findings. The purposeful sample allowed us to examine sanction implementation in States with widely varying attributes. We also gained thorough information on our respondents' relationships with and attitudes towards sanctions. Our methodology precludes us, however, from commenting on the extent to which our findings and observations are representative nationwide. We also cannot evaluate direct outcomes of sanction policies, procedures, and practices on clients and the program.

The following table provides an overview of selected attributes from the States we visited.

### Selected State Attributes

**Table 1**

	<b>TANF recipients, September 1998<sup>7</sup></b>			<b>TANF families, January 1999<sup>8</sup></b>		
State	Percent of national recipient population	Total	Percent change since August 1996	Total TANF caseload per office (limited to the offices we visited)	Total caseload per caseworker <sup>9</sup> (limited to the offices we visited)	Maximum sanction amount <sup>10</sup>
<b>California</b>	24.0	1,908,534	-26	364 to 17,484	60 to 212	Pro rata <sup>11</sup>
<b>Florida</b>	3.1	246,191	-54	1,200	not available	Full family
<b>Idaho</b>	0.04	3,285	-85	30 to 120	40 to 120	Full family
<b>Michigan</b>	3.9	308,817	-39	200	not available	25 percent
<b>Minnesota</b>	1.8	141,440	-17	150 to 15,179	70	Pro rata
<b>New York</b>	10.8	862,162	-25	92 to 2800	120 to 175	Pro rata
<b>Ohio</b>	4.0	319,912	-42	188 to 11,654	60 to 286	Full family
<b>Texas</b>	4.4	346,232	-47	88 to 481	200 to 225	\$78/\$125
Total	52.0	4,136,573	-35	30 to 15,179	40 to 286	

<sup>7</sup> Department of Health and Human Services, Administration for Children and Families, 1998. "Recipients" refers to all family members receiving cash assistance.

<sup>8</sup> The TANF agencies we visited provided all figures in the "TANF families" column. "Families" refers to the TANF case and typically includes all family members on assistance (see definition of recipients). According to ACF, TANF families averaged 2.7 recipients in September 1998.

<sup>9</sup> Includes all types of cases: TANF, Medicaid-only, food stamps-only, or any combination of the three benefits.

<sup>10</sup> Department of Health and Human Services, Administration for Children and Families, Office of Planning, Research and Evaluation, *TANF Program First Annual Report to Congress*, August 1998.

<sup>11</sup> As of August 1998, all counties in California, except one, impose pro rata sanctions. We visited eight counties in California, including the one that imposes full-family sanctions.

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This is one of three OIG reports on how States implement client sanctions under TANF. One companion report, *Temporary Assistance for Needy Families: Educating Clients about Sanctions* (OEI-09-98-00291), describes how States communicate to clients the changes in sanction policies and procedures. The other, *Temporary Assistance for Needy Families: Improving Client Sanction Notices* (OEI-09-98-00292), reviews State methods for informing clients of sanction decisions via written notices.

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# FINDINGS

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## **Caseworkers use sanctions to motivate clients, not to punish them**

According to a consensus of caseworkers in more than two-thirds of the focus groups, the purpose of client sanctions is either to motivate compliance with TANF programs or to motivate personal responsibility. Caseworkers use sanctions as a “wake-up call” or a “reality check” for clients. Some mentioned that sanctions are consistent with the message that welfare benefits are now time-limited. In approximately 15 percent of the focus groups, at least one caseworker mentioned that sanctions are used to punish clients.

Some caseworkers reported that sanctions cause clients to “feel” the consequences of their actions. Using this approach, caseworkers told us that sanctions can encourage client responsibility for one’s self and family.

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## **Sanctions are more effective when they are administered on a case-by-case basis**

Sanctions are very effective for specific TANF clients, according to caseworkers. For example, clients earning unreported income can be detected using sanctions. Clients who already are working and have no intention of participating in job preparedness or job search programs are being effectively sanctioned and in some cases have had their benefit levels adjusted. On the other hand, caseworkers and directors agreed that sanctions are least effective for the group known as “lifers” or “frequent flyers.” These are long-term recipients, frequently from inter-generational welfare families. They often face multiple barriers, compounded by the belief that public aid is a way of life and their inalienable right. This combination makes it very difficult for caseworkers to reach these clients effectively, whether through sanctions or other means.

Some States have policies and procedures designed to prevent clients who have legitimate barriers to participation from being sanctioned inappropriately. To identify any hidden barriers, some offices mandate home visits to all sanctioned clients. Other offices require contact between the caseworker and client prior to sanctioning. Some offices require clients to appear for a mandatory conciliation meeting at the TANF office prior to a reduction in benefits. The conciliation meeting provides clients with the opportunity to explain their reasons for noncompliance and possibly avoid the reduction. For example, one TANF office sanctioned a client for failure to provide proof of volunteer hours worked. The client avoided an interruption in benefits by providing proof of volunteer hours during the conciliation session.

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## **Sanctions are less effective when clients face substantial barriers to compliance**

The TANF population is so diverse that sanctions do not serve as motivators for all. Certain clients face barriers that prevent them from moving immediately from welfare to work. In some counties, TANF staff are not prepared to recognize or assess clients' problems. In others, staff lack the resources to help clients overcome barriers to employment.

### **Some clients face obstacles that hinder their immediate participation in TANF programs**

Some TANF clients are ill prepared to immerse themselves quickly in the world of work due to personal and public obstacles. One of the biggest barriers to employment is lack of transportation. In more than one-third of the sites visited, caseworkers cited transportation as a problem. Lack of reliable transportation is especially acute in rural areas, where clients already face limited prospects for entry-level jobs. At fewer sites, caseworkers said that clients face barriers such as poor English language skills, lack of affordable housing, attitude problems, and low self-esteem. Clients are delayed further from participating in TANF programs when they face multiple barriers.

Other barriers are more difficult for caseworkers to identify, but create insidious obstacles for clients. They include substance abuse, mental illness, low-literacy, and domestic violence. Identification of these barriers often rests solely with the caseworker, and failure to identify and address the problems may ultimately result in a sanction.

Most sites provide child-care subsidies and referrals. Some caseworkers cited their office's policy of providing referrals and subsidies for child care and would not accept clients' claims that quality child care is unavailable as a "good cause" for not working. In these offices, clients risk sanctions for missing a required meeting or not accepting a job offer due to lack of child care. Clients and caseworkers agree that the lack of quality child care constitutes a legitimate barrier to work. However, referral services for child care varied among the different sites. At one site, caseworkers referred clients to a community nonprofit "clearing house" for child care providers willing to accept county subsidies. At some sites, the TANF agency simply provided clients with a list of local providers. At another site, caseworkers offered little guidance to clients other than to "keep looking." Caseworkers and clients acknowledged that some clients are reluctant to or refuse to leave their children long enough to complete program requirements, although affordable and subsidized child care may exist. Caseworkers reported that some clients mistrust child care providers and refuse to place their children in day care.

## **TANF caseworkers have inadequate resources to identify their clients' barriers**

Determining if their clients face barriers to employment is a crucial responsibility of TANF caseworkers. The TANF law requires that States assess all clients required to participate in work activities. Most TANF offices used formal and/or informal processes to identify client barriers. The resources available to caseworkers during assessments varied among the offices. For example, some offices offered on-site drug and alcohol screening and domestic abuse counseling, while at another office, caseworkers simply administered written questionnaires to clients. We found one office that had no assessment program and placed clients in work experience programs after only a 3-week job search.

Simply getting all of the clients to come into the office for an assessment has proven to be a challenge. At some sites, a client's refusal or failure to appear for assessment is cause for sanction. Some offices send one or two letters requesting an appearance prior to imposing a sanction. Other offices require caseworkers to phone clients or make a home visit prior to sanctioning the family. At one site that routinely performs home visits, caseworkers lauded the practice as the most effective method of discovering client barriers.

Large caseloads and new job responsibilities adversely affect caseworkers' ability to address client barriers. Some caseworkers complained that their caseloads were too large to provide the individual service that TANF requires. Individual TANF caseloads ranged from 5 to 212 cases. When food stamps and Medicaid-only cases are added to the individual caseloads, the range ballooned to 40 to 286 cases. In some TANF offices, the shift in job duties from traditional eligibility determination to more complete case management has intensified the TANF casework.

Imposing sanctions is a cumbersome process, according to caseworkers in more than half of our focus groups. The rigorous paperwork associated with sanctions makes them burdensome and time-consuming. Other problems cited include complicated and outdated computer systems, new sanction rules and policies, communication problems, and more frequent client contact. Some caseworkers were reluctant to sanction clients, claiming it required too much work. Other caseworkers reported that they view sanctions as "punishment" for themselves because of the amount of time and effort required to sanction a client.

Caseworkers in several focus groups said that they lacked training about sanctions. At one TANF office, they had to spend a lot of time teaching themselves the new rules. Others reported "doing a very superficial job" with the clients. They are frustrated that they cannot provide in-depth services to clients. The TANF handbooks also contain incomplete sanction policies and procedures. Thus, caseworkers are unable to answer some of their clients' questions about sanctions. According to one client, "The change has been a big mess. I would ask the workers questions, and the workers wouldn't know the answers." Other clients acknowledged that their caseworkers are "under a lot of pressure" and "overwhelmed" because of the new rules. However, some clients remained



indignant, as indicated by one who said, “They (County) need to educate the workers about the regulations. They (caseworkers) don’t know the programs.”

While most of the TANF directors we interviewed reported that staff had received some training on the new sanction policies, the amount of training varied. Some caseworkers received twelve hours of training on the new policies; for others, training consisted only of memos regarding recent changes.

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## **Sanctions are administered more efficiently when the TANF office is a “one-stop job center” staffed by total case managers**

### **Extensive on-site client services and empowered case managers contribute to efficient client sanctions**

Local TANF agencies that operate as “one-stop job centers” are better suited to meet clients’ needs and therefore can sanction more efficiently. These reorganized offices typically offer a wide array of services designed to address client barriers. They send a clear message to clients: Welfare is temporary, and the TANF agency is committed to moving clients to self-sufficiency. Caseworkers and directors in these offices were more likely to report that sanctions are effective.

“Total case managers” exhibited a more in-depth understanding of their clients and sometimes seemed more interested in moving clients to self-sufficiency. Being responsible for both eligibility determination and employment services, total case managers said they understood the links among successful barrier identification, effective sanctions, and efforts to move clients to self-sufficiency. Being involved in all aspects of a client’s case allows caseworkers to develop a more comprehensive approach to determining the appropriateness of client sanctions.

Sanctions are more effective when caseworkers have more discretion during the sanction process. For example, in some offices, caseworkers have the freedom to determine whether a sanction is appropriate on a case-by-case basis. However, other TANF offices have automated the sanction process and immediately impose sanctions when a client fails to comply with a requirement.

## **Fragmented client services and strained communications impede caseworkers from imposing efficient client sanctions**

The traditional welfare office model, which emphasizes benefit eligibility with few in-house services, does not allow caseworkers to use sanctions as effectively as “one-stop job centers.” As a result, clients are more at risk of inappropriate sanctions, even when they face legitimate barriers to participation. For example, in one traditional welfare office, clients were placed on a county work crew, cleaning public parks after a 3-week up-front job search. No assessments or referrals to work preparation programs (e.g., GED classes) were offered. A husband and wife at that office had been sanctioned for not completing their minimum number of hours on the work crew, despite their interests in other job preparation programs that qualify under the State’s work participation rules. Their caseworker had no knowledge of the couple’s interests or abilities.

Offices that employ separate eligibility and employment caseworkers, sometimes miles away from one another, are least prepared to sanction clients efficiently. Workers in these arrangements often complained of the constraints the distance between the branches, both literal and figurative, put on effective communication.<sup>12</sup> Clients must complete duplicate forms and explain things to two caseworkers, causing stress and frustration among all parties. Clients were frustrated by the repetitive and sometimes conflicting information they received from caseworkers. “Nobody gives us the same information,” complained one client. Clients often were confused about which caseworker to call to discuss a sanction or their situation in general.

Efficient sanctioning also can be impeded by the introduction of third parties to the sanction process. In some counties, the TANF agency opted to contract with nonprofit or private firms for various client services. In general, contracted services include, but are not limited to: initial assessments, job search, and job preparedness. Some States give contractor staff authority to sanction TANF clients for not participating in their programs. When contractors initiate a client sanction, they tell State or county TANF staff when to adjust the client’s benefits. In some cases, caseworkers do not know the specific cause or remedy for their clients’ sanctions. Caseworkers reported strong dissatisfaction with this process because they often are the first to hear from a client who receives a sanction notice, yet they have little information or advice to offer. Their ability to help clients move into compliance is hindered when they cannot explain the cause and remedy for the sanction.

Some total case managers reported, however, that they are overwhelmed by the shift in job duties and increased responsibilities. They complained that their caseloads are too large to do all that is necessary for their clients. Others reported that their relationships with clients have transformed substantially as a result of their new job responsibilities and not always for the better.

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<sup>12</sup>For more information on communication issues in TANF offices, see the companion report entitled *Temporary Assistance for Needy Families: Educating Clients about Sanctions* (OEI-09-98-00291).

# S U M M A R Y

This report was intended to provide a broad introduction to State administration of client sanctions under TANF. The companion reports, *Temporary Assistance for Needy Families: Educating Clients about Sanctions* (OEI-09-98-00291) and *Temporary Assistance for Needy Families: Improving Client Sanction Notices* (OEI-09-98-00292) provide more detailed information, including recommendations to improve Federal guidance.

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